

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

**ENFORCEMENT
CONFIDENTIAL**

OK to release
8/15/11

Completed by: Mary Wojciechowski
Date: March 15, 1992

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OCT 13 1995

Background Facility Information

Facility Name: GM Fischer Body Division - Detroit Fort Street Plant
EPA Identification No.: MID 005 356 787
Location (City, State): Detroit, Michigan
Facility Priority Rank: Low

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Entire facility - 4 SWMUs and 1 Area of Concern

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?
- ☐ No corrective action activities initiated (Go to 5)
- ☒ RCRA Facility Assessment (RFA) or equivalent completed
- ☐ RCRA Facility Investigation (RFI) underway
- ☐ RFI completed
- ☐ Corrective Measures Study (CMS) completed
- ☐ Corrective Measures Implementation (CMI) begun or completed
- ☐ Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

☐ Operating permit
☐ Post-closure permit
☐ Enforcement order
☒ Other (Explain)

A clean up took place in response to a spill in 1984. No further information is available.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

☐ Yes
☐ No
☒ Uncertain; still underway
☐ Not required

Additional explanatory notes:

There is no information regarding the adequacy of the clean up mentioned in question 3. It is also not known what environmental media (if any) were affected.

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

- ☐ Ground water
- ☐ Surface water
- ☐ Air
- ☐ Soils
- ☒ Unknown

6. Are contaminant releases migrating off-site?

- ☐ Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:

Surface water:

Air:

Soils:

- ☐ No
- ☒ Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 8a)
- ☐ No
- ☒ Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes
- ☐ No
- ☒ Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 9)
- ☐ No
- ☒ Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes
- ☐ No
- ☒ Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

☐ Solid
☐ Light non-aqueous phase liquids (LNAPLs)
☐ Dense non-aqueous phase liquids (DNAPLs)
☐ Dissolved in ground water or surface water
☐ Gaseous
☒ Other Unknown

13. Which of the following major chemical groupings are of concern at the facility?

☐ Volatile organic compounds (VOCs) and/or semi-volatiles
☐ Polynuclear aromatics (PAHs)
☐ Pesticides
☐ Polychlorinated biphenyls (PCBs) and/or dioxins
☒ Other organics
☐ Inorganics and metals
☐ Explosives
☐ Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

☐ Yes; Indicate possible course of action.

☒ No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

☐ Yes
☐ No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

☐ Yes
☐ No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

☐ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

☐ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

- ☐ Yes
- ☒ No, not feasible
- ☐ No, not required

Explain final decision, using additional sheets if necessary.

On 11/21/84 1,300 gallons of diphenyl methane diisocyanate (MDI) was released at the facility.
Facility representatives claim that the spill was cleaned up and all clean up residues were
appropriately disposed of. However no information or documentation was provided regarding the
spills location environmental media affected, extent of contamination and adequacy of clean up.
Until more information is obtained, the need for stabilization cannot be determined.

HRE-8J

Stuart Lichter, President
S.L. Equities, Inc
P.O. Box 7000-242
Redondo Beach, CA 90277-9998

Re: Visual Site Inspection Report Fort/Livernois Industrial Property
(formerly GMC Fisher Body-Fort Street Plant) Detroit, MI
MID 005 356 787

Dear Mr. Litcher:

The United States Environmental Protection Agency (U.S.EPA) reviewed the Preliminary Assessment/Visual Site Inspection (PA/VSI) Final Report of the General Motors Corporation Fisher Body Division, Detroit Street Plant in Detroit, Michigan.

Enclosed please find the PA/VSI Final Report of the referenced facility. If you have any questions contact me at (312) 886-4449.

Sincerely yours,

Ivonne A. Vicente Morales
Environmental Engineer
Technical Enforcement Section #1

HRE-8J:IVICENTE:03/23/95:f:\user\share\tes.#1\GMC

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CONCURRENCE REQUESTED FROM REB			
SEC/BR SECRTRY	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF

S.L. Warehousing- Detroit, Ltd.

P.O. Box 242
REDONDO BEACH, CA. 90277
310/378-0336
FAX 310/378-0878

ONE WEST AVENUE
LARCHMONT, NEW YORK 10538
914/833-1500
FAX 914/834-2002

March 21, 1995

Mr. Kevin M. Pierard
Chief OH/MN Technical
Enforcement Section
U.S. Environmental Protection Agency

Re: Visual Site Inspection Report
Fort/Livernois Industrial Property
(formerly GMC Fisher Body- Fort Street
Plant)
Detroit, Michigan
M1D00536787

Dear Mr. Pierard:

As per our recent phone conversation, we are requesting a copy of the "Preliminary Assessment/Visual Inspection Report" that resulted from your November 1991 site visit to our facility. We understand that this report is available to us as per your October 31, 1991 letter (copy enclosed) to me.

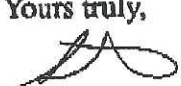
Please send the copies of the Visual Site Inspection Report to the following addresses:

S.L. Warehouse- Detroit, Ltd.
c/o Leo D. Phillips, Manager
725 South Adams, Suite 260
Birmingham, Michigan 48009

S.L. Equities, Inc.
Stuart Lichter, Pres.
P.O. Box 7000-242
Redondo Beach, CA. 90277-9998

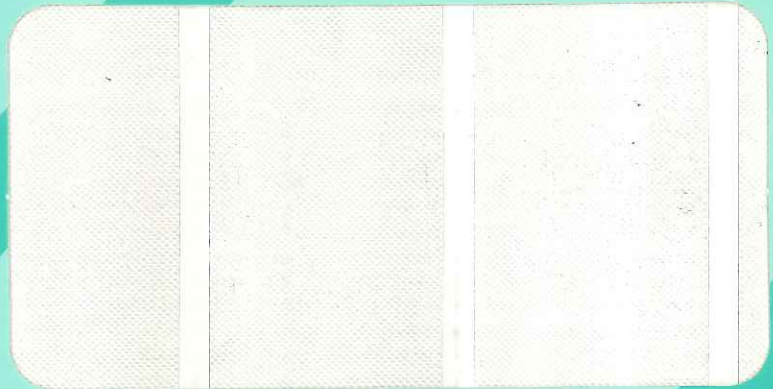
Your prompt attention to this matter will be greatly appreciated.

Yours truly,


Stuart Lichter
President



U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006



TES 9

**Technical Enforcement Support
at Hazardous Waste Sites
Zone III
Regions 5,6, and 7**



PRC Environmental Management, Inc.

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PRC Environmental Management, Inc.
233 North Michigan Avenue
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**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**GENERAL MOTORS CORPORATION
FISHER BODY DIVISION
DETROIT FORT STREET PLANT
DETROIT, MICHIGAN
MID 005 356 787**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	MID 005 356 787
Date Prepared	:	May 28, 1992
Contract No.	:	68-W9-0006
PRC No.	:	209-R05032MI09
Prepared by	:	PRC Environmental Management, Inc. (Sherry Gernhofer)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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From A. Vicente Morales
This material can be released.
March 23 1995

EXECUTIVE SUMMARY

**ENFORCEMENT
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PRC Environmental Management, Inc. (PRC) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the former General Motors Corporation, Fisher Body Division, Detroit Fort Street Plant (GM Fisher Body) facility in Detroit, Michigan. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

The facility covers about 35 acres and is located in a mixed industrial and residential area of western Detroit, Wayne County, Michigan. General Motors Corporation, Fisher Body Division, owned the facility from 1917 to 1991. GM Fisher Body manufactured exterior and interior trim used at the Fleetwood Plant in the assembly of Cadillac bodies. In 1991, the property was parceled and sold to two different companies. Sybill, Inc. purchased the parcel east of Dragoon Street and west of Calvary Street, which contains a wastewater treatment facility, two incinerators, and a power house. S.L. Warehousing Detroit, Ltd. purchased the remainder of the facility, which consists mainly of empty warehouses.

Information regarding former waste generating processes at the GM Fisher Body Plant was unavailable. Although the specific waste generating processes are unknown, the waste types generated at the former facility were identified through applications submitted and inspections performed. According to those documents, the majority of the wastes generated consisted of spent solvents and paint sludge generated by the former painting operations. In addition, wastes such as nickel sulfate and lead chromate were generated by the former plating operations.

On November 18, 1980, the facility submitted a RCRA Part A application to obtain interim status as a treatment, storage, and disposal facility. It is not known whether a closure plan was implemented. Sybill, Inc. submitted a notification of regulated waste activity on June 17, 1991, after assuming ownership of part of the former GM Fisher Body Plant. The facility currently is operated by two separate companies. Sybill, Inc. is operating the wastewater treatment facility and plans to reactivate the powerhouse and incinerators. S.L. Warehousing Detroit, Ltd. manages the empty warehouses and the former drum storage area. S.L. Warehousing intends to rent this space out (PRC, 1991).

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DATE

RIN #

INITIALS

12/4/00
MB

The PA/VSI identified the following four SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Wastewater Treatment System Receiving Tanks
2. Wastewater Treatment System Treatment Tanks
3. Incinerators (2)
4. Former Drum Storage Area

Area of Concern

1. Diphenyl Methane Diisocyanate Spill Area

The potential for release to any media from the SWMUs identified at this facility is low because it has sound secondary containment. In addition, only the wastewater treatment facility currently is operational. The remainder of the facility is either empty or inactive. The potential for release from the AOC identified is unknown, because information regarding the location and nature of the spill was unavailable. Although it was reported that the spill was contained and cleaned up, it is unknown whether any material escaped to the surrounding area.

No release to ground water was observed during the PA/VSI, nor have any documented releases from the SWMUs or AOC to ground water been identified. The potential for release is low because most of the facility grounds are paved. Sound secondary containment exists around the wastewater treatment system's receiving and treatment tanks (SWMUs 1 and 2). Similarly, the incinerators (SWMU 3) are located in a warehouse and are currently inactive. The former drum storage area (SWMU 4) is currently empty. In addition, ground water is not used for drinking water in this area.

No release to surface water was observed during the PA/VSI, nor have any documented releases to surface water been identified. The potential for release to surface water from any of the SWMUs or AOC is low because most of the facility grounds are paved and because secondary containment for the SWMUs is sound. In addition, any potential releases from the facility would be collected by the nearby storm water system and directed to the Detroit Water and Sewer Department (DWSD) combined sewer system that leads to the city publicly owned treatment works (POTW).

No release to the air was identified during the file review or observed during the PA/VSI. None of the SWMUs or AOC identified presents a significant threat of release to the air except

the incinerators, which currently are inactive. The current owners do intend to reactivate the incinerators in order to burn sludge generated from the wastewater treatment system; that reactivation will increase the potential for release to the air.

No release to on-site soils was observed during the PA/VSI, nor have any documented releases to on-site soils from the SWMUs or AOC been identified. The potential for release to on-site soils from the SWMUs or AOC is low. Sound secondary containment, combined with the fact that most of the area is paved, makes the likelihood of a release to on-site soils very low. Access to the facility is limited by a fence that surrounds most of it. The empty warehouses are monitored routinely by on-site security personnel.

PRC recommends no further action at this time for the SWMUs. All SWMUs at the facility are either well maintained or currently inactive. No releases were identified and it seems unlikely that there is potential for release in the future. When and if the incinerators are brought back on line, the owner should obtain appropriate operating permits.

For the diphenyl methane diisocyanate spill area (AOC 1), PRC recommends that the facility furnish additional information about the incident, including the exact location of the spill and the manner in which it was cleaned up and disposed of. PRC has sent a written request to the facility for this information. Sampling might be required to characterize the contamination that might have resulted from the spill.

RELEASED
DATE 12/4/00
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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic

basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the former GM Fisher Body Plant in Detroit, Michigan. The PA was completed on October 14, 1991. PRC gathered and reviewed information from the Michigan Department of Natural Resources and from EPA Region V RCRA files. The VSI was conducted on November 14, 1991. It included interviews with four facility

representatives and a walk-through inspection of the facility. Four SWMUs and one AOC was identified at the facility.

The VSI is summarized and five inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B, and a letter to the parent company, General Motors Corporation (GMC), requesting information is included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

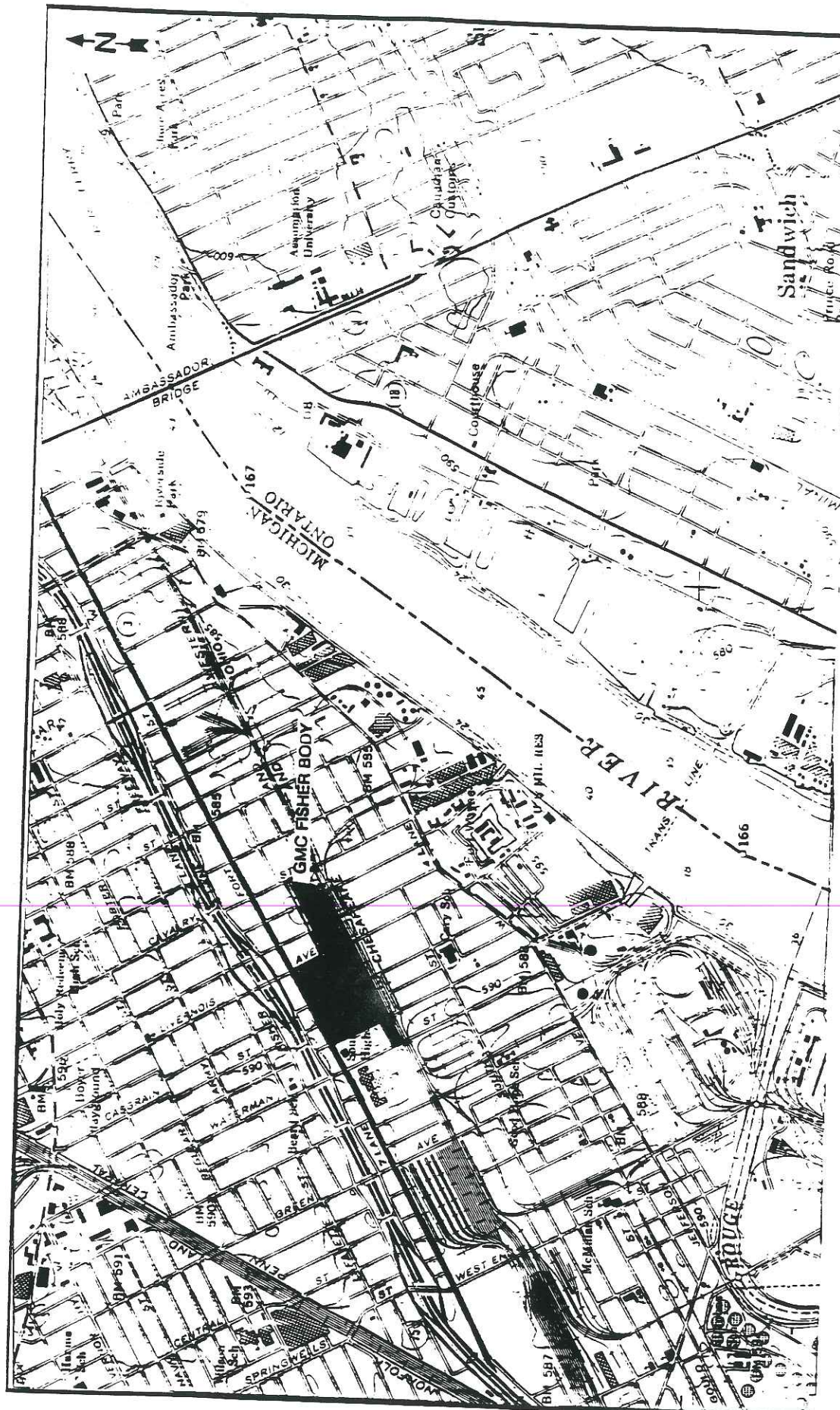
The former GM Fisher Body Plant was located at 6307 West Fort Street in western Detroit, Wayne County, Michigan (latitude 42°18'19" N, longitude 83°06'09" W), as shown in Figure 1. The facility occupies approximately 35 acres in an area characterized by heavy industrial, commercial, and urban-residential land use.

The facility is located one-half mile northwest of the Detroit River and encompasses several city blocks within the city of Detroit. GM Fisher Body is bordered on the south by the Norfolk and Western Railroad, on the north by Fort Street, on the east by Cavalry Avenue, and on the west by Waterman Street. In January 1991, GM Fisher Body subdivided the property and sold it to two different owners. Dragoon Avenue separates what is now two different facilities (Figure 2). Sybill, Inc. owns and operates the facility to the east of Dragoon Avenue (wastewater treatment plant, power house, and two incinerators) and S.L. Warehousing Detroit, Ltd. owns the property west of Dragoon Avenue (empty warehouses and former drum storage area).

For this report, the term "the facility" refers to the former GM Fisher Body Plant, not to specific parcels of land once owned by GM Fisher Body.

2.2 FACILITY OPERATIONS

GM Fisher Body began operating as an automotive components manufacturer in the 1920s. Past operations at the facility include metal plating, aluminum anodizing, painting, and varnish manufacturing. Recently, the facility has been involved in the production of soft- and hard-trim subassemblies, door hinges, and T-roof assemblies (Inland Fisher Guide, 1991). The exterior and interior trim parts manufactured at the facility were used at the Fleetwood Plant in the assembly of Cadillac bodies (MDNR, 1983). GM Fisher Body ceased operations at the facility in 1990. All manufacturing equipment has been removed; only empty warehouses remain. The equipment was either auctioned off or shipped to another GMC facility (PRC, 1991). No other information about



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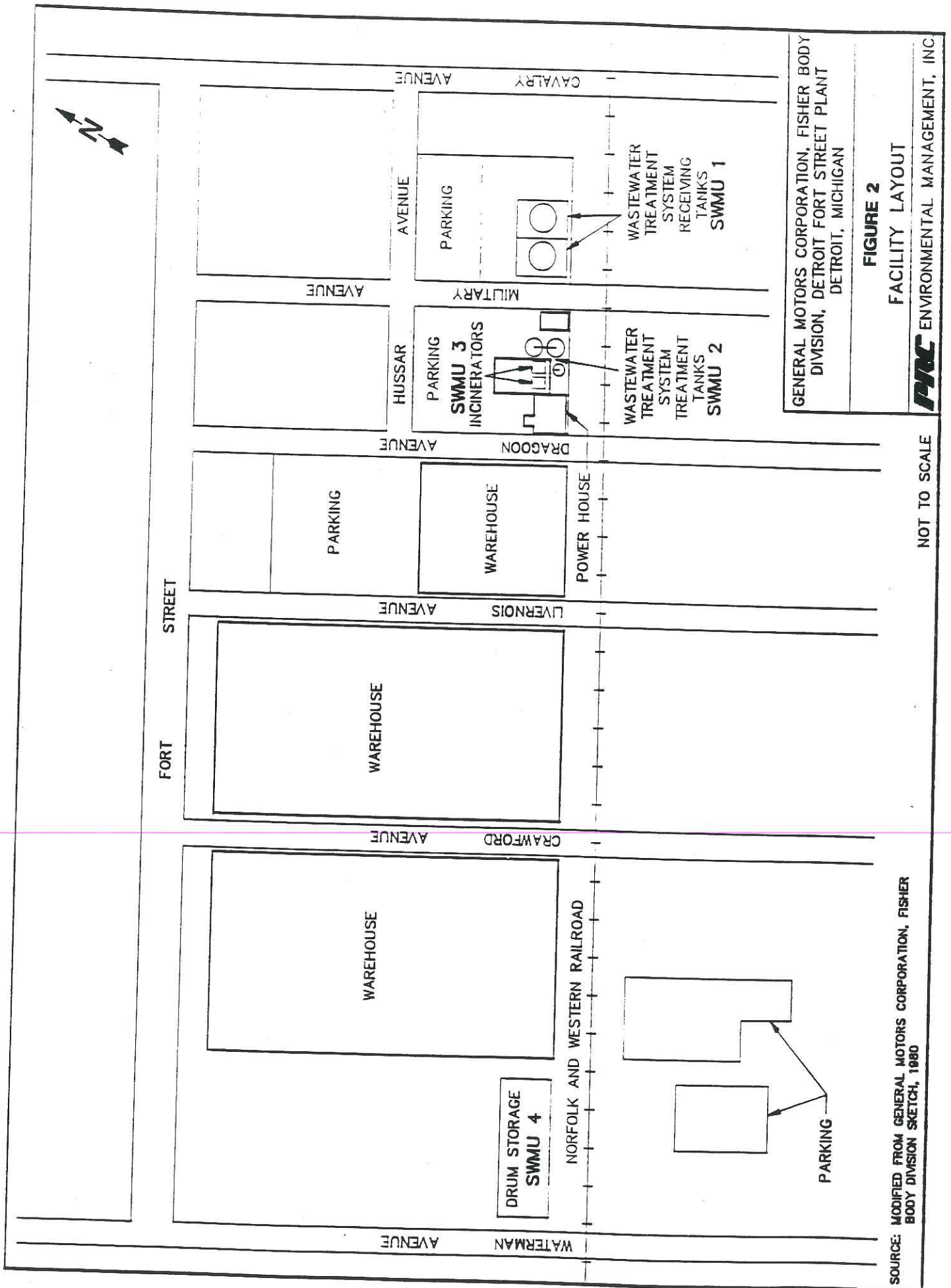
SCALE: 1" = 2,000'

GENERAL MOTORS CORPORATION, FISHER BODY
DIVISION, DETROIT FORT STREET PLANT
DETROIT, MICHIGAN

FIGURE 1

FACILITY LOCATION

ENVIRONMENTAL MANAGEMENT, INC.



GENERAL MOTORS CORPORATION, FISHER BODY
DIVISION, DETROIT FORT STREET PLANT
DETROIT, MICHIGAN

FIGURE 2

FACILITY LAYOUT

PMC ENVIRONMENTAL MANAGEMENT, INC.

NOT TO SCALE

SOURCE: MODIFIED FROM GENERAL MOTORS CORPORATION, FISHER
BODY DIVISION SKETCH, 1980

past operations was available from review of EPA's files on the facility or from conversations with former employees.

The facility currently is operated by two different owners. Sybill, Inc. (Sybill), operates the wastewater treatment system (SWMUs 1 and 2). Sybill is preparing to accept nonhazardous industrial wastewaters from local facilities for treatment in these units. In addition, Sybill, Inc. intends to reactivate the power house and refuse incinerators (SWMU 3). The rest of the former facility is occupied by S.L. Warehousing Detroit, Ltd., which currently is attempting to rent the area that once housed the bulk of the facility's operations (PRC, 1991). Table 1 lists the SWMUs identified at the facility and describes their current status.

2.3 WASTE GENERATING PROCESSES

Information about former waste generating processes at the GM Fisher Body plant was not available. PRC was unable to obtain this information from the facility's EPA file and was unsuccessful in soliciting the information from Inland Fisher Guide, the parent company and former owner. Although the specific waste generating processes are unknown, the waste types generated at the facility were listed in the facility's RCRA Part A permit application (EPA, 1980b), in the RCRA Generator Hazardous Waste Report for 1983 (EPA, 1983), and in a 1983 RCRA inspection conducted by MDNR (MDNR, 1983). According to these documents, the majority of the wastes generated at the facility consisted of spent solvents and paint sludge generated by the former painting operations. In addition, such wastes as nickel sulfate and lead chromate, were generated by the former plating operations. According to the Part A permit, the waste material was stored in 55-gallon drums (SWMU 4). Wastes subsequently were treated in tanks and surface impoundments (EPA, 1980b). The exact locations of the storage areas are unknown. Table 2 presents a summary of the types of solid wastes generated at the facility.

2.4 HISTORY OF DOCUMENTED RELEASES

On November 21, 1984, approximately 1,300 gallons of diphenyl methane diisocyanate (MDI) were released through a ruptured pressure gauge. All the material was contained in a diked area and subsequently cleaned up (Powser, 1985). Additional information regarding the exact location and nature of the spill was unavailable. It is unknown how the spill was cleaned up and disposed of. A request has been made to GM Fisher Body to provide additional information about the spill (see Attachment C).

Table 1
Solid Waste Management Units (SWMUs)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Wastewater Treatment System Receiving Tanks	No	Active
2	Wastewater Treatment System Treatment Tanks	No	Active
3	Incinerators	No	Inactive
4	Former Drum Storage Area	Yes	Inactive

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit application.

Table 2
Solid Wastes

Waste/EPA Waste Code	Source	Primary Management Unit*
Non-hazardous wastewaters	Wastewater treatment facility	SWMUs 1 and 2
Incinerator ash	From the incineration for the facility's refuse	SWMU 3
Waste silicone liquid	Foam line flush operation	SWMU 4
Waste methylene chloride mixture (F002, U080, U223)	Foam gun flush operation	SWMU 4
Waste paint sludge (D001)	Paint spraying operation	SWMU 4
Waste nickel sulfate mixture	Electroplating sludge	SWMU 4
Waste polyol liquid (F002, U080, U223)	Foam line flush operation	SWMU 4
Waste potassium hydroxide solution (D002)	Stripper sludge from painting operation	SWMU 4
Waste lead chromate mixture (D007, F006)	Electroplating sludge	SWMU 4
Compound paint reducing liquid (D001)	Paint gun flush operation	SWMU 4
Hazardous waste oil liquid (D008)	Plant waste oil	SWMU 4
Waste oil (D001)	Plant waste oil	SWMU 4
Dimethyl formamide mixture	Foam gun cleaner	SWMU 4
Waste toluene diisocyanate (U223)	Foam line operation	SWMU 4
Waste polychlorinated biphenyls	Waste oil	SWMU 4
Waste solvents	Painting operations	SWMU 4

Note:

- * Primary management unit refers to the SWMU that currently manages or formerly managed the waste.

REGULATORY HISTORY

The GM Fisher Body plant submitted its first notification of hazardous waste activity on July 30, 1980 and submitted a subsequent notification on March 4, 1988. The facility submitted a RCRA Part A application to obtain interim status as a treatment, storage, and disposal facility on November 18, 1990. According to correspondence from the EPA to the GM Fisher Body Plant, a certified closure plan was submitted toward the end of 1985. Neither the closure plan nor the certification of closure was found; either would have confirmed the exact date of closure. It is not known whether the closure plan was implemented. PRC has requested this information from GM Fisher Body.

Sybill, Inc. submitted a notification of regulated waste activity on June 17, 1991, after assuming ownership of part of the former GM Fisher Body Plant. A request for transfer of EPA identification number from the GM Fisher Body Plant to Sybill, Inc. also was submitted with the notification form.

Several RCRA compliance inspections were conducted by the MDNR in September, 1982; March, 1983; May, 1985; and June, 1987 (MDNR, 1982; MDNR, 1983; MDNR, 1985; and MDNR, 1987). Inspectors noted violations involving the facility's waste analysis plan, inspection log, operating records (MDNR, 1982), security measures, personnel training (MDNR, 1982; MDNR, 1985), and owner or operator inspections (MDNR, 1987). GM Fisher Body responded to the notices of violation with corrective action (GMC, 1982; GMC, 1985; and GMC, 1987).

No NPDES permits were identified during the review of the EPA file, nor did personnel from Sybill, Inc. or S.L. Warehousing Detroit, Ltd. know whether any NPDES permits existed. However, Sybill, Inc. indicated during the PA/VSI that the corporation had been approved for an industrial wastewater treatment permit to discharge to the Detroit Water and Sewer Department (DWSD). At the time of the site inspection, Sybill, Inc. had not yet had its first discharge to the DWSD (PRC, 1991).

Approximately 40 operating air permits were issued to the former GM Fisher Body Plant. Although specific information is missing regarding which areas of operation the permits covered, it is likely that the permits regulated air discharges from the boilers, the manufacturing equipment, and the two incinerators (SWMU 3) used to burn the facility's trash (PRC, 1991). No information was available regarding the facility's compliance with their air permits.

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the GM Fisher Body Plant. Facility-specific information regarding the environmental setting was not available; therefore, regional data were used.

2.6.1

Climate

The climate in Detroit and its surrounding area is characterized by evenly distributed precipitation throughout the year. The average annual precipitation is 30 to 33 inches. The annual net precipitation in the Detroit area is in the range of 5 to 15 inches (Federal Register, 1990). Average monthly temperatures range from a high of 72 degrees Fahrenheit (°F) in July to a low of 23°F in January. Weather in the vicinity is controlled by: (1) location with respect to major storm tracks, and (2) proximity to, and influence of, the Great Lakes. Typical winter storms bring periods of rain or snow. Summer storms usually pass to the north and often are associated with brief showers and sometimes thunder showers with high winds. The Great Lakes mitigate most climatic extremes (Erickson, 1990).

Due to the topography of the area, the moist northwest air dries before it reaches the Detroit area. For example, summer showers coming from the northwest often dissipate before reaching Detroit. The winter northwesterly winds bring snow to all of Michigan but rarely in accumulations of measurable depth in the Detroit area. The southeasterly winds generally contain more moisture. In any season, the area's heaviest precipitation is brought on by southeasterly winds. The prevailing wind direction in the Detroit area is from the southwest. One-year 24-hour rainfall for this area is about 2 inches (National Oceanic and Atmospheric Administration [NOAA], 1980).

2.6.2

Flood Plain and Surface Water

The closest surface-water body to the GM Fisher Body Plant is the Detroit River, located approximately 3,000 feet northeast of the facility. The Detroit River is Detroit's primary drinking-water source. Surface waters from the facility drain into the Detroit Water and Sewer Department (DWSD) combined sewer system and subsequently to the city publicly owned treatment works (POTW). The GM Fisher Body Plant is not located in a 100-year flood plain area (U.S. Geological Survey [USGS], 1974).

2.6.3 Geology and Soils

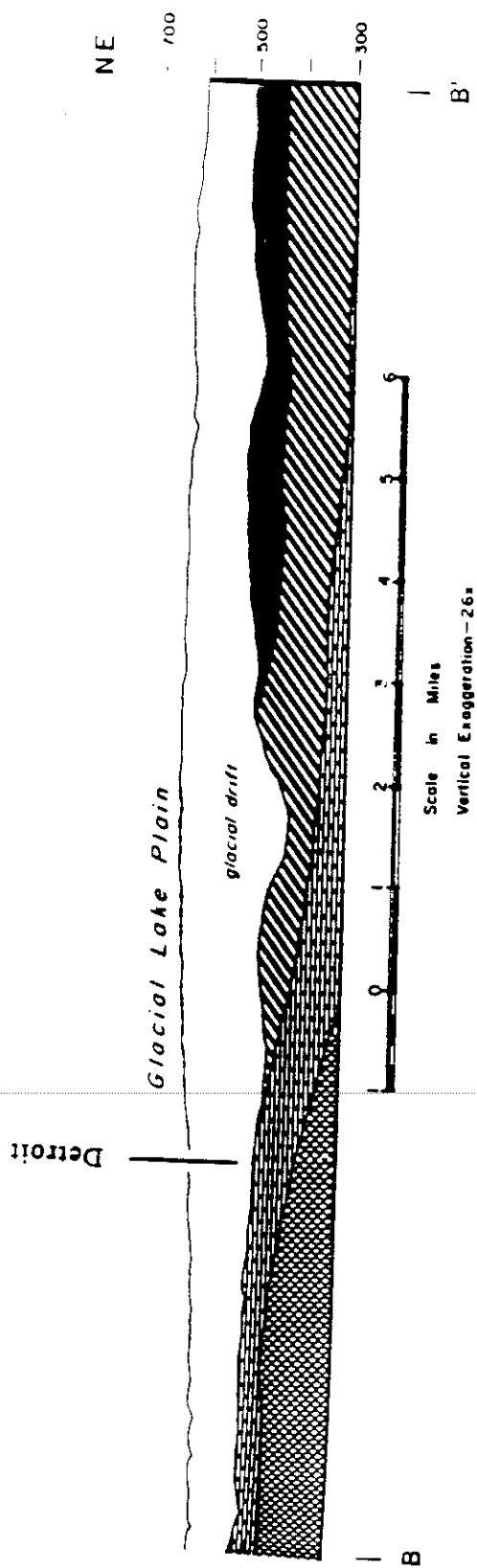
Because site-specific information was not available, regional geologic and soil information is presented. Figure 3 illustrates a generalized geologic cross section of the Detroit area. The surface geology of the Detroit area is characterized by a mosaic of glacial and organic deposits. Present land forms are the result of Pleistocene epoch glaciation and subsequent deposition and erosion. Primarily, the present land forms consist of materials deposited during the Cary substage of the Wisconsin Glacial stage; however, the hardpan encountered just above the bedrock in downtown Detroit occupies part of an ancient glacial lake bed of gently sloping to nearly flat terrain that has been incised by currently flowing rivers and streams. In this area, glacial deposits over bedrock range in thickness from 120 to 200 feet. These deposits consist mainly of layers of glacial till of varying thickness and a thick sequence of lacustrine clays and silts. Figure 4 illustrates the areal distribution of permeable surface deposits in southeast Michigan.

The bedrock of Detroit consists of approximately 830 feet of consolidated and cemented Middle Devonian limestone from the Paleozoic era. This structural feature underlies all of Michigan and portions of neighboring states. With this structural basin, the sedimentary rocks dip at an angle of less than 1 degree toward the center of the basin, which is located beneath the central portion of the southern peninsula (Mozola, 1969).

Soils of the area surrounding the facility are mainly of the Wasepi-Gilford-Boyer soil association. This type of soil is characterized by nearly level to sloping, very poorly drained, somewhat poorly drained, and well drained soils that have a coarse textured or moderately coarse textured subsoil. Permeability is moderately rapid, and water capacity is low. About 50 percent of the soils in this association are poorly drained, 25 percent are very poorly drained, and 15 percent are well drained. The remaining 10 percent consists of minor soils (U.S. Soil Conservation Service, 1977).

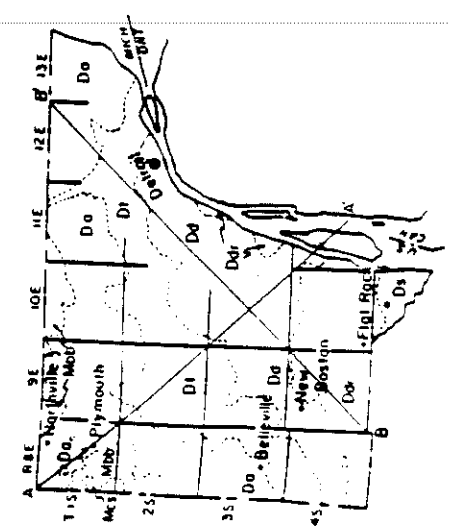
2.6.4 Ground Water

No site-specific information pertaining to ground water was available during the PA/VSI; however, a description of ground-water conditions based on regional information is given below. Based on information obtained during the PA/VSI, ground water is not used within a 3-mile radius of the site.



LEGEND

	COLDWATER SHALE
	SUNBURY SHALE
	BEREA SANDSTONE
	BEDFORD SHALE
	ANTRIM SHALE
	TRAVERSE GROUP
	DUNDEE LIMESTONE
	DETROIT RIVER DOLOMITE
	SYLVANIA SANDSTONE
	BASS ISLANDS GROUP



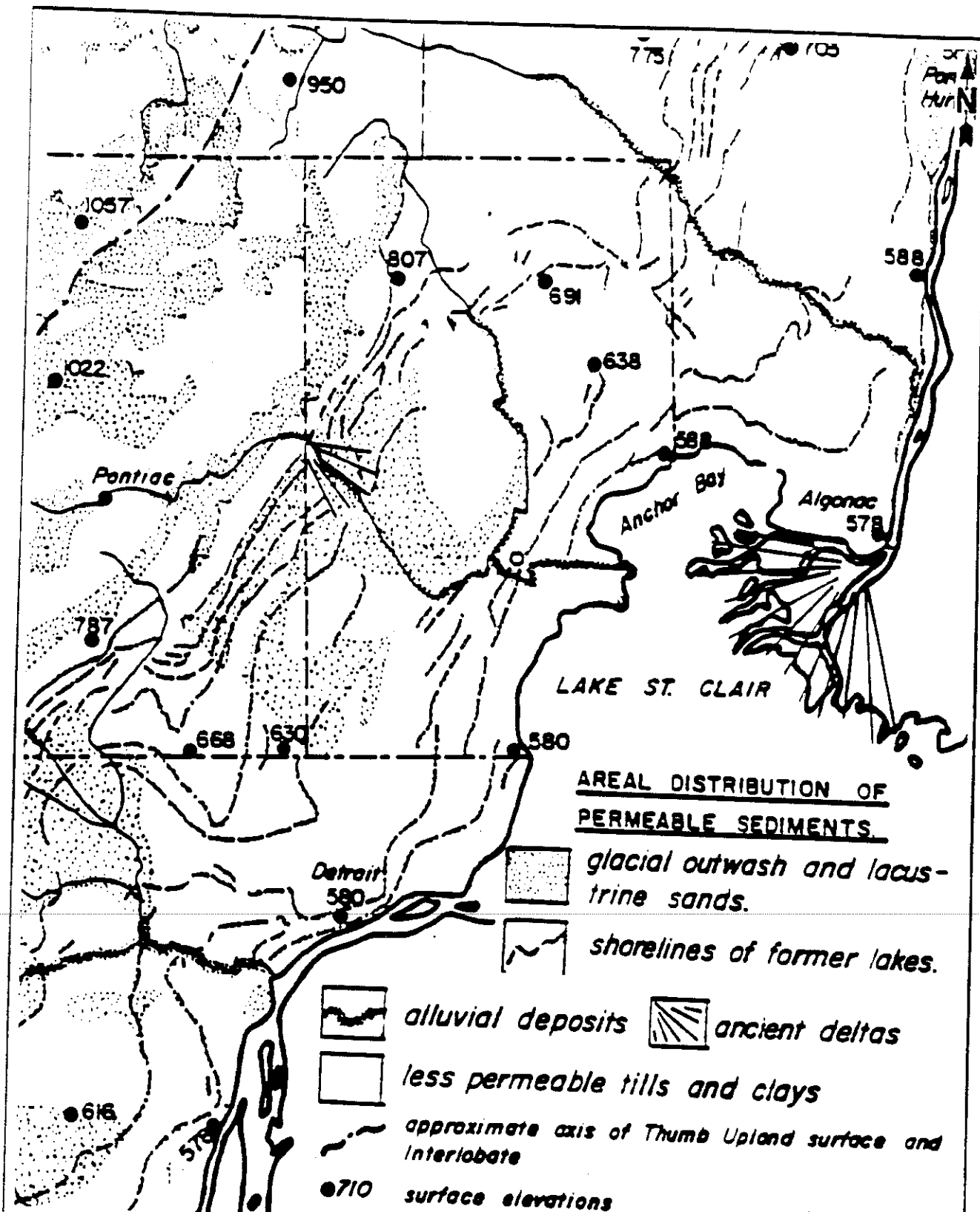
GENERAL MOTORS CORPORATION, FISHER BODY
DIVISION, DETROIT FORT STREET PLANT
DETROIT, MICHIGAN

FIGURE 3

GEOLOGIC STRUCTURE SECTION

PMAC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: MOZOLA, 1968



SCALE NOT AVAILABLE

SOURCE: MOZOLA, 1969

GENERAL MOTORS CORPORATION, FISHER BODY
DIVISION, DETROIT FORT STREET PLANT
DETROIT, MICHIGAN

FIGURE 4
DISTRIBUTION OF PERMEABLE SURFACE
DEPOSITS IN SOUTHEAST MICHIGAN

EMC ENVIRONMENTAL MANAGEMENT, INC.

Ground water occurs beneath the site in water table conditions at approximately 40 feet beneath ground surface and generally flows toward the Detroit River. However, because Detroit is located on a glacial lake plain, composed primarily of silts and clays, the area is not favorable for the development of wells having moderate-to-large yields. Storage capacities are limited and well failures can be expected during prolonged droughts (USGS, 1989). Although the lake plain has a high frequency of dry holes, small domestic supplies in intermittent zones of relatively greater permeability than the surrounding clay and silt deposits are normally possible (Figure 5). These intermittent zones occur under confined conditions, and both flowing and non-flowing wells can be expected. Southeast of the junction of the lake plain with the glacial moraines (Figure 6), the frequency of occurrence, thickness, and extent of these confined ground-water bearing zones decreases as the formations near the Detroit River.

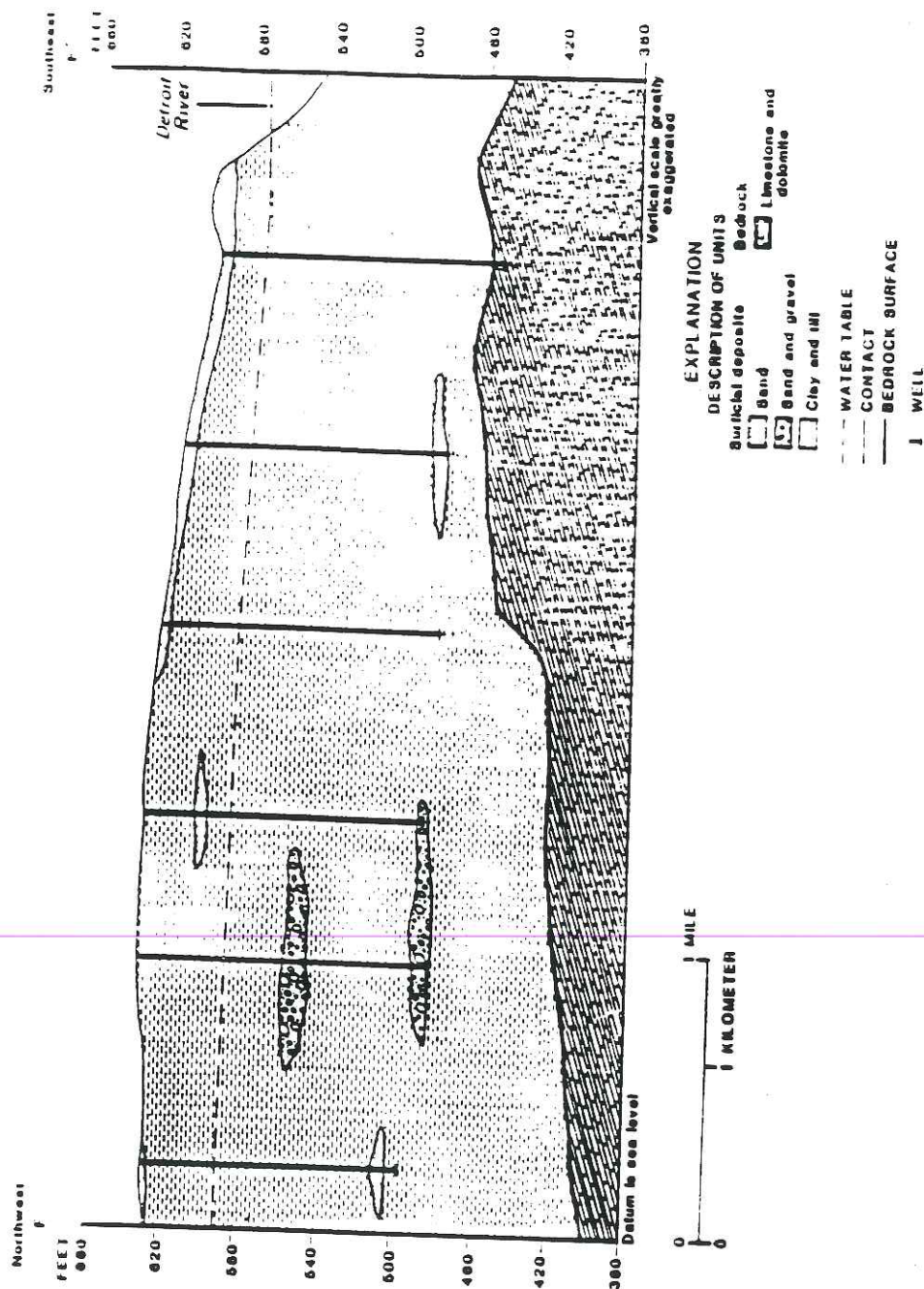
Although the silt and clay deposits beneath the site have limited ability to yield usable quantities of water, the quality of the shallow ground water is usually soft and potable unless contaminated by man. In the intermittent zones mentioned above, mineralization increases with depth. In addition, the quality of water from deep confined zones is often impaired by chlorides, hydrogen sulfide, and methane gas (Mozola, 1969).

2.7 RECEPTORS

The GM Fisher Body Plant occupies approximately 35 acres in a mixed industrial and residential area of western Detroit, Wayne County, Michigan. Most of the facility is paved. No sensitive environments were identified within two miles of the facility.

The GM Fisher Body Plant is bordered on the north by Fort Street, on the west by Waterman Street, on the east by Cavalry Avenue, and on the south by the Norfolk and Western Railroad. There are residences, a high school, and numerous businesses adjacent to the property. Most of the facility is located within the confines of a warehouse. Access to the facility is controlled by fences and on-site security personnel.

The nearest surface water, the Detroit River, is less than a mile away. Surface waters drain from the facility to the Detroit combined sewer system. The combined sanitary sewer discharges to the publicly owned treatment works (POTW) before discharge to the Detroit River (PRC, 1991). The Detroit River is used as the primary drinking water source for Detroit and for recreation.



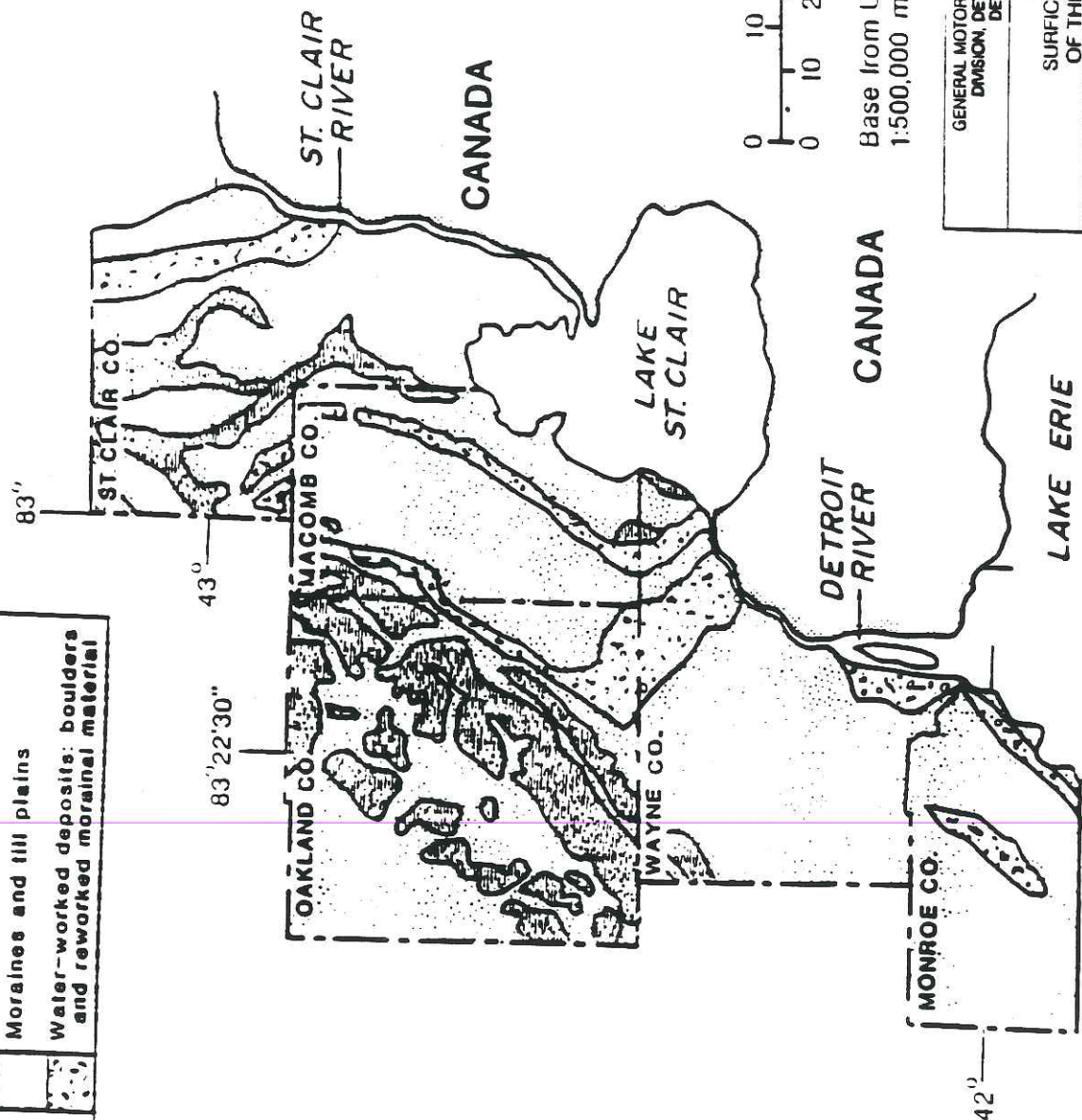
GENERAL MOTORS CORPORATION, FISHER BODY
DIVISION, DETROIT FORT STREET PLANT
DETROIT, MICHIGAN

FIGURE 5
REPRESENTATIVE GEOLOGIC CROSS SECTION
OF THE DETROIT AREA

PMC ENVIRONMENTAL MANAGEMENT, INC.

EXPLANATION

QUATERNARY		Lakebeds, sand and clay
		Moraines and till plains
		Water-worked deposits: boulders and reworked moraine material



0 10 20 MILES
0 10 20 KILOMETERS

Base from U.S. Geological Survey
1:500,000 map

GENERAL MOTORS CORPORATION, FISHER BODY
DIVISION, DETROIT FORT STREET PLANT
DETROIT, MICHIGAN

FIGURE 6

SURFICIAL GLACIAL FEATURES
OF THE DETROIT RIVER AREA

ENVIRONMENTAL MANAGEMENT, INC.

As discussed in Section 2.6, the geology underneath the Detroit area is least favorable for the development of wells of moderate-to-large yields. During the PA/VSI no wells were identified within a 3-mile radius of the site.

There are residences directly across the street from and northeast of the facility. The prevailing wind direction in the Detroit area is from the southwest. Under these conditions, releases of hazardous constituents to the air would be directed to the northeast toward those residences.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the four SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and PRC observations.

SWMU 1

Wastewater Treatment System Receiving Tanks

Unit Description:

The unit consists of two 250,000-gallon storage tanks that receive incoming wastewaters. The two steel tanks rest on a fiberglass-reinforced concrete floor within a concrete retaining wall that has a concrete splash extension. The perimeter of the storage area is 85 feet by 80 feet. The unit will be operated by Sybill, Inc. to treat nonhazardous wastewaters received from off-site generators. Photos 1, 2, 3, and 4 in Attachment A depict this unit.

Date of Startup:

Tanks were constructed in 1972.

Date of Closure:

This unit currently is operational.

Wastes Managed:

The unit manages nonhazardous wastewaters from a variety of industrial processes.

Release Controls:

This unit is surrounded by a 6-foot high, 10-inch thick reinforced concrete wall. The containment volume exceeds 305,000 gallons and surpasses the regulation for a containment volume equal to the volume of the largest tank (250,000 gallons). There are no drains within this containment. The floor of the area is concrete reinforced with fiberglass. Rain water and snow-melt water are monitored daily and pumped into the treatment tanks when necessary.

History of Release:

No release from this SWMU were identified during the PA/VSI.

Observations:

During the VSI, the tanks and surrounding concrete containment appeared to be in good condition, with no cracks or signs of fatigue in the tanks or the concrete. The unit had received several shipments of wastewater.

SWMU 2

Wastewater Treatment System Treatment Tanks

Unit Description:

This unit consists of two 360,000-gallon and one 170,000-gallon tank, used for treating the wastewaters pumped over from the receiving tanks (SWMU 1). The three steel tanks rest on a fiberglass-reinforced concrete floor within a concrete retaining wall that has a concrete splash extension. The unit will be operated by Sybill, Inc. to treat nonhazardous wastewaters received from off-site generators. Photo 4 in Attachment A depicts this unit.

Date of Startup: The tanks were constructed in 1967.

Date of Closure: This unit currently is operational.

Wastes Managed: The unit manages non-hazardous wastewaters from a variety of industrial processes.

Release Controls: This unit is surrounded by and 8-foot high, 9-inch thick reinforced concrete wall. In addition, a splash guard has been installed at appropriate locations along the concrete wall. Total containment volume exceeds 550,000 gallons and surpasses the regulation for a containment volume of one and one-half times the volume of the largest tank (360,000 gallons). All drains have been backfilled with concrete to preclude their use (PRC, 1991). The flooring of the unit is concrete reinforced with fiberglass. The area of the unit is 14,148 square feet. Rain water and snow-melt water are monitored daily and pumped into the treatment tanks when necessary.

History of Release: No releases from this SWMU were documented during the PA/VSI.

Observations: During the VSI, the tanks and surrounding concrete containment appeared to be in good condition with no cracks or signs of fatigue in the tanks or the concrete. The unit was in operation.

SWMU 3

Incinerators

Unit Description: Two (2) dual Consumat incinerators are located inside a 16,000-square-foot building, of which 10,000 square feet are used as a "tipping" floor for receiving wastes. The dual-chamber incinerators are capable of handling 100 tons per day and work in concert with a heat recovery steam boiler. The incinerators received nonhazardous wastes from other facilities, as well as from their own.

Date of Startup: 1985. The units operated for approximately 5 years.

Date of Closure: The incinerators have been inactive since 1990. The current owners plan to reactivate the units to burn sludge generated by the wastewater treatment plant.

Wastes Managed: The incinerators once received the facility's trash, which consisted of 90 percent wood and 10 percent plastic. It is anticipated that the incinerators will burn wastewater treatment plant sludge beginning approximately in June 1992.

Release Controls: The units are housed in a building that has concrete flooring. The walls of the building provide containment.

History of Release: No releases from this SWMU were documented during the PA/VSI.

Observations: The building that houses the incinerators essentially was empty. Both incinerators were inactive. Their structures appeared sound.

SWMU 4

Former Drum Storage Area

Unit Description: This unit consists of a concrete pad located on the southwest corner of the facility. The pad is a 53.5-foot by 40.25-foot paved concrete area constructed with a 4,400-gallon sump basin for collecting any hazardous waste spills. The entire surface is contained by a water dam and dikes. No more than 1,040 drums could be stored at any one time. This unit formerly was used to store the facility's hazardous wastes. Drums of wastes generated by facility operations were stored in this area until they were disposed of offsite. The unit also is protected by an overhead canopy. Photo 5 in Attachment A depicts this unit.

Date of Startup: Unknown

Date of Closure: Approximately 1985

Wastes Managed: The hazardous wastes stored at this unit included flammable liquids, flammable solids, and waste methylene chloride mixtures (F002, U080, U223). Other wastes stored included silicone liquid, paint sludge, nickel sulfate, polyol liquid, potassium hydroxide, lead chromate, paint reducing liquid, waste oil, dimethyl formamide, toluene diisocyanate, and other miscellaneous solvents. It is unknown how the wastes were disposed of.

Release Controls: This unit consists of a diked concrete pad that is covered by a canopy. The diked pad is supplemented by a 4,400-gallon sump. A secured fence surrounds the perimeter.

History of Release: No releases from this SWMU were documented during the PA/VSI.

Observations: During the VSI, the unit was empty but appeared to be in good condition, with few signs of fatigue in the concrete or canopy.

4.0 AREAS OF CONCERN

PRC identified one AOC during the PA/VSI. The AOC is discussed below; its location is unknown.

AOC 1

Diphenyl Methane Diisocyanate Spill Area

No specific information regarding the location or history of this spill was available. It was reported that 1,300 gallons were released through a ruptured pressure gauge and that all the material was contained and cleaned up. This unit is being identified as an AOC because of the lack of information regarding the incident. PRC has requested that GM Fisher Body provide information concerning the location, nature, history, and cleanup of the spill.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified four SWMUs and no AOCs at the GM Fisher Body Plant facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the GM Fisher Body Plant facility and suggests further action.

SWMU 1 Wastewater Treatment System Receiving Tanks

Conclusions: This unit currently poses little threat of release. The system has adequate secondary containment and seems structurally sound and well maintained. The threat of release from this unit by various pathways is summarized below.

Ground Water: Low. The surrounding soils are paved, thus limiting the vertical migration of contaminants. In addition, ground water is not used for drinking water or for industrial purposes in this area.

Surface Water: Low. The unit has sound secondary containment, capable of controlling a spill. In addition, any spilled material escaping the secondary containment would be collected by the storm sewer system and directed to the city's publicly owned treatment works (POTW) before being released to the Detroit River.

Air: Low. The facility currently does not manage wastes that have a significant potential for releasing hazardous constituents into the air.

On-site Soils: Low. The surrounding soils are paved, thus limiting the potential for release to on-site soils. In addition, wastes currently managed do not pose a significant threat of a release of hazardous constituents. Should a spill of the nonhazardous industrial wastewaters occur, the material either would be contained or would be directed to nearby sewers, limiting the threat to on-site soils.

Recommendations: No further action is recommended at this time.

SWMU 2 Wastewater Treatment System Treatment Tanks

Conclusions: This unit currently poses little threat of release. The system has adequate secondary containment and seems structurally sound and well maintained. The threat of release from this unit through various pathways is summarized below.

ENFORCEMENT
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Table 3
SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Suggested Further Action
1. Wastewater Treatment System Receiving Tanks	1972 to present	None	No further action
2. Wastewater Treatment System Treatment Tanks	1967 to present	None	No further action
3. Incinerators	1985 to unknown date	None	No further action
4. Former Drum Storage Area	Unknown date to 1985	None	No further action

AOC	Dates of Operation	Evidence of Release	Suggested Further Action
1. Diphenyl Methane diisocyanate spill area	Unknown	Yes	Provide additional information. Sampling may be necessary

RELEASED
DATE 12/4/88
RIN #
INITIALS WJ

Ground Water: Low. The surrounding soils are paved, thus limiting the vertical migration of contaminants. In addition, ground water is not used for drinking water or for industrial purposes in this area.

Surface Water: Low. The unit has sound secondary containment capable of controlling a spill. In addition, any spilled material escaping the secondary containment would be collected by the storm sewer system and directed to the city's POTW before being discharged to the Detroit River.

Air: Low. The facility currently does not manage wastes that have a significant potential for releasing hazardous constituents into the air.

On-site Soils: Low. The surrounding soils are paved, thus limiting the potential for release to on-site soils. In addition, wastes currently managed do not pose a significant threat of a release of hazardous constituents. Should a spill of the nonhazardous industrial wastewaters occur, the material either would be contained or would be directed to nearby sewers, limiting the threat to on-site soils.

Recommendations: No further action is recommended at this time.

SWMU 3 Incinerators

Conclusions: This unit is currently inactive and therefore poses no current threat of release. In addition, the unit is located within the confines of a warehouse. Should the incinerators be brought back on line, only the threat of release to air will increase significantly. The threat of release from this unit through various pathways is summarized below.

Ground Water: Low. The unit is inactive. The surrounding soils are paved, thus limiting the vertical migration of contaminants. In addition, ground water is not used for drinking water or for industrial purposes in this area.

Surface Water: Low. The unit is inactive. No waste material currently is being managed by the incinerators.

Air: Low. The unit is inactive. No waste material currently is managed by the incinerators. The threat of release to air will increase if the incinerators are brought back on line.

On-site Soils: Low. The unit is inactive. The surrounding soils are paved, thus limiting the potential for release to on-site soils. In addition, the unit is inactive. No waste material currently is being managed in the incinerators.

Recommendations: No further action is recommended at this time.

SWMU 4 Former Drum Storage Area

Conclusions: This unit currently poses little threat of release. The unit is inactive. All waste material has been removed and disposed of off site. In addition, no

releases from this unit have been identified. The threat of release from this unit through various pathways is summarized below.

Ground Water: Low. The unit is inactive. The surrounding soils are paved, thus limiting the vertical migration of contaminants. The unit has containment dikes and a collection sump. In addition, ground water is not used for drinking water or for industrial purposes in this area.

Surface Water: Low. The unit is inactive and no longer manages hazardous waste. The unit has containment dikes and a collection sump.

Air: Low. The unit is inactive and no longer manages hazardous waste.

On-site Soils: Low. The surrounding soils are paved, thus limiting the vertical migration of contaminants. The unit has containment dikes and a collection sump. In addition, the unit is inactive and no hazardous waste currently is being managed there.

Recommendations: No further action is recommended at this time.

AOC 1 Diphenyl Methane Diisocyanate Spill Area

Conclusions: It is unknown what threats are posed by this AOC because of the lack of information.

Recommendations: PRC recommends that the facility furnish additional information about the incident, including the exact location of the spill and the manner in which it was cleaned up and disposed of. PRC has sent a written request to the facility for this information. Sampling might be required to characterize the contamination that might have resulted from the spill.

RELEASED

DATE

RIN. #

INITIALS

12/4/00

uav

REFERENCES

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- USGS, 1989, Ground water flow and quality near the upper Great Lakes connecting channels, Michigan.
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ATTACHMENT A
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

GENERAL MOTORS CORPORATION
FISHER BODY DIVISION
DETROIT FORT STREET PLANT
DETROIT, MICHIGAN
MID 005 356 787

Date: November 14, 1991

Facility Representatives: D.A. (Don) McGlone, General Manager, Nave, Inc. (Sybill, Inc.),
(313) 336-7750
John G. Christopher, Treasurer, Nave, Inc. (Sybill, Inc.),
(313) 928-5572
Terrence P. Conway, Associate Coordinator, Office of General
Counsel, General Motors Corporation (313) 974-1154
Leo Phillips, S.L. Warehousing Detroit, Ltd.

Inspection Team: Sherry Gernhofer, PRC Environmental Management, Inc.
Dave Phillips, PRC Environmental Management, Inc.

Photographer: Sherry Gernhofer

Weather Conditions: Partly cloudy, low 40s

Summary of Activities: The inspection team arrived at the facility at 9:00 a.m. A pre-inspection briefing was given to representatives of Nave, Inc. After the briefing, the inspection team waited for some time for representatives from the Michigan Department of Natural Resources, S.L. Warehousing Detroit, Ltd., and General Motors Corporation. Those representatives never arrived to complete the first part of the inspection.

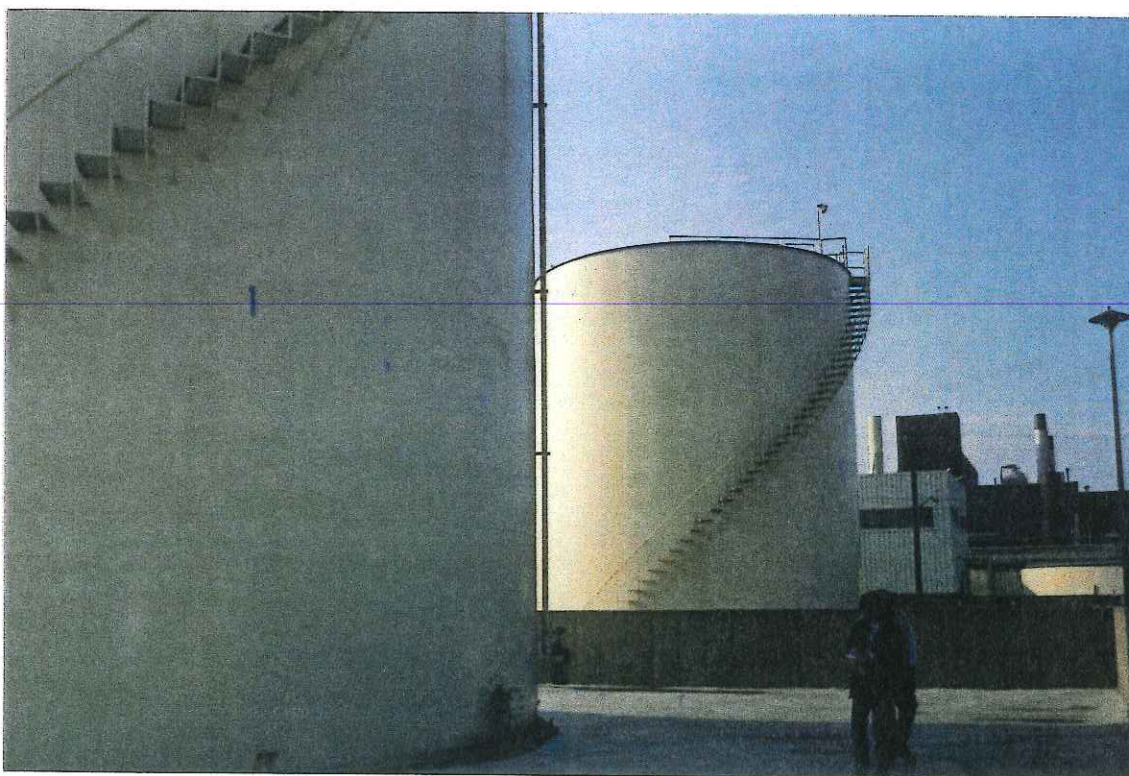
The site tour of the parcels owned and operated by Sybill, Inc. commenced at 10:10 a.m. A tour of the wastewater treatment plant was given. PRC inspectors were allowed to view the tanks and were given a description of the process. A tour of the inactive power house and incinerators also was given. Photographs were taken of the facility's solid waste management units. The tour was completed by 11:00 a.m.

After the inspection of the parcels owned by Sybill, Inc., an attempt was made to contact the remaining persons involved in the inspection. The representatives from S.L. Warehousing Detroit, Ltd. and General Motors were waiting on the other side of the facility, on the parcel currently owned by S.L. Warehousing Detroit, Ltd. Dave Phillips gave these individuals a preinspection briefing on the purpose and scope of the PA/VSI. A tour of the remaining areas of the facility began at 11:45 a.m. The remaining parts of the facility consisted of empty warehouse and an empty drum storage area. The tour ended at 1:00 p.m.



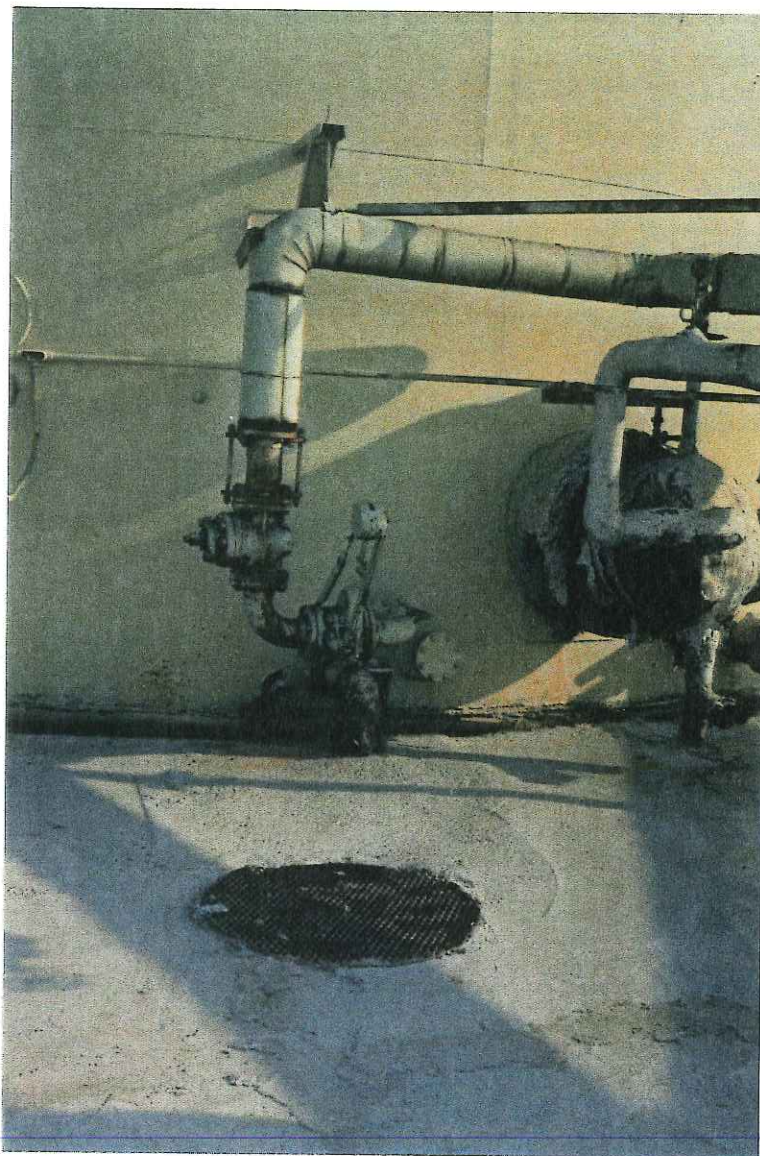
Photograph No. 1
Orientation: West
Description: Wastewater treatment system receiving tank
 (note dikes and concrete secondary containment)

Location: SWMU 1
Date: 11-14-91



Photograph No. 2
Orientation: West
Description: Wastewater treatment system receiving tanks

Location: SWMU 1
Date: 11-14-91



Photograph No. 3
Orientation: West
Description: Wastewater treatment system receiving tank
(note sealed drain and fiberglass reinforced floor)

Location: SWMU 1
Date: 11-14-91



Photograph No. 4
Orientation: West
Description: Wastewater treatment system (receiving tank in background, treatment tanks in foreground)

Location: SWMU 1 and 2
Date: 11-14-91



Photograph No. 5
Orientation: North
Description: Former drum storage area

Location: SWMU 4
Date: 11-14-91

ATTACHMENT B
VISUAL SITE INSPECTION FIELD NOTES

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Dearborn, Michigan 48126

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ASSOCIATE COORDINATOR
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GENERAL MOTORS CORPORATION
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3031 WEST GRAND BLVD
P.O. Box 33122
DETROIT, MICHIGAN 48212

11-14-91

DMG

GMC Fisher Body

aka Sybail Inc.

aka S.L. Detroit Warehousing

aka NAVE, Inc.

met at 09:16 with

NAVE Representatives:

Don McGlone, Gen. Manager

John Christopher, Treasurer

Joe Dombrowski, Chemist

PRC Environmental Mgmt, Inc.

Representatives:

Dave Phillips

Sherry Gernhofer

partly cloudy skies,
upper 70's F

11-14

11-14-91

smg

Current Operations

- receive non-haz. waste-waters, trucked in (alot from steel mills) - will accept any non-haz. wastewaters that, after treatment, can be discharged to Detroit sewer system.
- NAVE has owned part of original property since 1/7/91
- have not had 1st discharge yet, probably on 11/18/91 (will have to have ~~part's~~^{smg's} discharge sampled before releasing to sewer)

11-14-91

smg

113

Current Operations - cont'd

- has industrial wastewater Treatment Permit for Detroit water and sewer Dept. (DWSRD)
 - when shipment is received, take 1st sample, run fingerprint analysis, if determined treatable, will off-load.
 - NOTE: NAVE, Inc. and Sybil, Inc. are individual companies, with common ownership.
- Past Operations
(see pollution incident prevention plan for ~~STW~~ descriptions)

11/1 11-14-91

Sing

- Power House and Incinerator functional but not operating yet, plan to become fully operational in stages (~2 yrs)
- 2 50-ton/day consumer incinerators, dual-chamber, cyclone, Wayne County permitted, 100 tons/day for 90% wood, 10% plastic.
- Also, 2-heat recovery steam boilers, low-high pressure boilers operating @ 150 psi (work in concert w/ incinerators)

- No scrubbers on incinerators
- wants to set-up boilers to run on waste-oil, used to run on fuel oil

11-14-91

Sing

- Eric Fisher Backy did run incinerators previously - Spill Rep thinks for 15 years.
- Initial feed to incinerator waste^{gas} was oil, 2nd feed (afterburner) fed by natural gas.

Facility Tour 10:10

photo 12 - off-loading area for incoming trucks -

concrete-lined, ~6-inch diked area

photo 13 - holding tank (receiving)

photo 14 - concrete-lined, 2^o containment (fiberglass)

laden to prevent severe cracking) used to be lined w/ clay; gravel

116

11-14-91

Sung

photo 15: 2° containment
for ~~the~~ ^{Sung} receiving tanks
(tank 2)

photo 16: drain to sump,
goes back into treatment
tank (#4)

photo 17 - tank 1 in foreground,
tank 2 in background

- tanks not pressure-tested
but did have ultra-sound
testing of thickness of
walls - no inconsistencies
found (tested before filled)
- Full containment recently
installed (finished Oct. 11, 91)
- 8' wall, sealed, discharge
permit received Oct. 21, 91
- Tanks 4 & 5 lined w/
fiber glass - re-done

11-14-91

Sung

photo 18, 19, 20

Incinerator (Inside Bldg)

photo 21 - lower chamber

of incinerator

• Boiler shut-down due to

CO₂ emissions, ran on

No. 6 fuel oil

photo 22, 23, 24

taken from top of

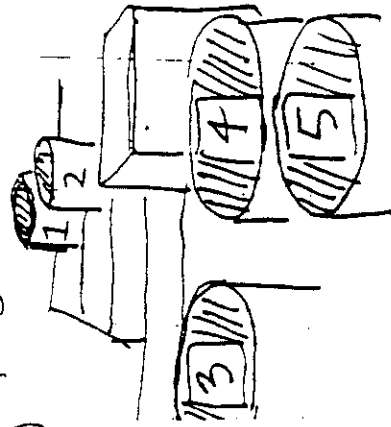
Incinerator / power house

shows tanks 1 & 2 in

background (pre-treatment)

and tanks 3, 4 & 5 in

foreground (treatment)

Wastewater
Treatment
Drying

11-14-91

Aug

photos 25, 26, 27, 28

panoramic view from
top of boiler/incinerator
remaining 2 parcels
once owned by Fisher

Body
Facility now concluded at
11:00 (at Supin part of
facility)

Representatives from G.L.
Warehousing were directed
to meet at Ware house
instead of laboratory.

Met with Terry Conway,
Gen Office of General Comstock
said if we required any
info. from them would
submit request in
writing.

11-14-91

Aug

Also met with Leo Phillips, rep. of
current owner of remaining
parcels

Facility Tour - 11:45
photo 29 - E

former storage area
(products) empty now
photo 30 - Bldg 31
only portion currently
leased - spare particle board
photo 31 - Bldg 26

walking south
basement area - not much
Bible, suspected that
Gen Office of General Comstock
entered here (from diagram)
photo 32 - Administrative
Cafeteria, 1st Aide

130

11-14-91

smg

Photo 32 + Bldg A (vacant!)

Photo 33 - former holding tank area

Photo 34 Bldg 10

(Vacant!)

Photo 35 - Former Drum Storage Area (Hazardous waste storage) Empty

Terry Conway: (313) 974-7770/Fax

Tow concluded 13.00

~~Cherry Hill~~

121

BRIDGET REISINGER

2800 CLARK STREET
DETROIT, MI 48232
313 554-6597
GM 8-284-8597
Fax 313 554-6384

SENIOR ENVIRONMENTAL ENGINEER
CADILLAC MOTOR CAR DIVISION
GENERAL MOTORS CORPORATION

TIMOTHY A. CORE

2800 CLARK STREET
DETROIT, MI 48232
313 554-6598
GM 8-284-8599

ENVIRONMENTAL ENGINEER
CADILLAC MOTOR CAR DIVISION
GENERAL MOTORS CORPORATION

ED JENKINS

2800 CLARK STREET
DETROIT, MI 48232
313 554-5716
GM 8-284-3716

GENERAL SUPERVISOR
WASTEWATER TREATMENT
CADILLAC MOTOR CAR DIVISION
GENERAL MOTORS CORPORATION

(89)

121

14-91

IPA/USI at former GMC Fisher Body Plant - Detroit Fort Street Plant

Weather Conditions Sunny 40°F's

Arrived at the facility at 9:00 AM

Conducted Pre-inspection Briefing

Participants

John Christopher NAVE

D.A. (Don) McGlone NAVE

Dave Phillips PRC

Sherry Gerinhofer PRC

Waste Water Treatment Facility Operations

Facility receives non-hazardous waste H_2O s from various industries (e.g. steel mills) and waste H_2O s that the facility can treat under their permit.

Acquired facility in Jan 7, 1991

Discharge goes to Detroit Sewer System

First discharge to occur next week

Facility has obtained pretreatment permit.

11-14-91

DF

11-14-91

DC

911

Eventually, facility ^{to install a}
filter press to dewater sludges.
Sludges will eventually be disposed
of at an off-site facility.

Detroit Water and Sewerage Dept. (DWSD)

- Facility requires:

- TCEP analysis
conducts treatability analysis

Upon receiving wastes: Facility
conducts a fingerprint analysis

Description of Treatment System

Storage Tanks

(Facility: Provided us with a
Pollution Incident Prevention Plan)
which contains details on tanks,
equipment, etc.

DF

Incinerators

2-50 ton/day units
dual chamber / cyclone separators
units are not operational right now.

Capacity

100 tons/day waste

Waste - 90% wood

Definition 10% plastic

possible start-up June 1992

2 Heat recovery boilers - also used to
reduce emission temp.

Purchased from Flint, MI (GMC
facilities) - GMC obtained them
from Genesee County.

Possibly with units will be fired
w/ waste oil - (i.e. the heat
recovery boilers)
Eventually, the sludge from the WWT
will be incinerated on site.

GMC operated the incinerators
for ~5 yrs.

(92) 11-14-91 DSF

Briefing concluded 10:10 AM

Began Visual inspection @ 10:15 AM

Truck unloading area

Cement poured - provided w/ containment wall.

- Tanks 1, 2

Removed containment soil prior to covering bottom w/ concrete (cyan - latex concrete)

- Tanks appeared to be in very good condition

- Ultrasonic testing for metal thickness prior to filling tank.

- Secondary containment areas appeared sound.

DSF

11-14-91 DSF

Tanks 3, 4, 5 10:30 AM

Facility added providing paving to formerly barren area adjacent to the tanks. Also added ~ 12 ft concrete leach containment wall in 1991.

Tanks appeared in good shape. Facility still constructing containment walls.

Incidents: 10:45 AM

Viewed loading / staging area of incinerators - unit currently not operational. Also viewed boiler house. Both were not in operation.

Concluded tour of Sybil facility at

11:15 AM. Left facility at 11:17 AM

D. A. (DON) McGLONE
General Manager

NAVE INC

Administrative Offices
400 Town Center - Suite 300
Dearborn, Michigan 48126

Beeper 903-5043
(313) 336-7750
FAX (313) 336-7256

64. 11-14-91 JS

Arrived at other parcel of property
formerly owned by GAC Fisher body.
11:25 AM

Met with:

Terry Conway
Leo Phillips

FAX #

GAC Fisher (713) 747-7720

Began inspection @ 11:50 PM

- Abandoned Warehouse - nothing
left inside except overhead cranes.

- Building 34 (or 31)

Only area that is currently
being leased by company that
manufactures car stools - facility
stores various parts of the stools in
this area.

Building 26:

Abandoned - No remnants of ma-
chinery or equipment.

Plating Treatment Area inside Building 26

Abandoned - no remnants of tanks
or other equipment - Concrete
floor appears to be in good shape.

11-14-91 JS

JS

Building 14

Abandoned. No equipment or other
machinery observed. Various bits and
pieces of debris lying about.

Building 10

Abandoned. No machinery or equipment
present. Two leaking fire-water
lines. Floors in appalling shape
to be in good shape.

Former Hazardous Waste Dump
Station

Cement paved w/ 1 ft. berming and
equipped w/ a canopy. No drums
present. Electrical substation
adjacent to former drums storage area.

Concluded VSI at 1:00 PM

Left the facility at 1:45 PM

JS 11-14-91

ATTACHMENT C
REQUEST FOR INFORMATION

February 3, 1992

Ms. Michelle Fisher
Attorney
Office of General Counsel
General Motors Corporation
New Center One Building
3031 West Grand Boulevard
Detroit, MI 48232

Subject: Request for information regarding the former General Motors Corporation, Fisher Body Division, Detroit Fort Street Plant, 6307 West Fort Street, Detroit, Michigan (MID005356787)

Dear Ms. Fisher:

As you requested, I am submitting a written request for information regarding the former General Motors Corporation, Fisher Body Division, Detroit Fort Street Plant. We are missing from our files basic background information on the facility's former operations and waste management practices. Files indicate that a closure plan was submitted in lieu of a RCRA Part B permit application for the former drum storage area. Files also indicate that certification of the closure was submitted on March 2, 1985. We do not have copies of the closure plan or the certification of closure. We would appreciate your help in obtaining copies of them.

We are requesting any information that will enhance our technical understanding of the past waste flows and handling, treatment, storage, and disposal practices. This includes any information regarding past manufacturing and waste management activities and any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, or sampling data sheets that might be available.

A list of potential solid waste management units (SWMU) and areas of concern (AOC) identified during our visual site inspection (VSI) is enclosed as an attachment. Outlined in this attachment are the specific questions we need answered in order to complete our report. In addition, information we obtained during the VSI indicates that a 1,300 gallon spill of diphenyl methane diisocyanate (MDI) occurred on November 21, 1984. No specific information regarding the location, history, and cleanup of the spill has been provided. Because of the lack of information regarding the incident, we have identified the spill as an area of concern (AOC).

I understand, through conversations with Mr. David Tackman of Inland Fisher Guide and Stuart Lichter of S.L. Warehousing Detroit, Ltd., that an extensive environmental assessment was performed at the facility before the property was transferred. It would be extremely helpful if we could obtain a copy of this document.

Michelle Fisher - page 2

Your cooperation and assistance in compiling this information will help greatly to expedite our efforts. We intend to use this information to construct the most accurate description of the facility possible. I do apologize for giving you short notice; however, we understood, through conversations with David Tackman, that this information would be provided to us two months ago. Thank you for your assistance. If you have any questions about this request, please call me at (703) 883-8888.

Sincerely,

Sherry M. Gernhofer
Environmental Scientist

Attachment

cc: Paul Wooldridge, PRC
Shin Ahn, PRC
Kevin Pierard, EPA Region 5

ATTACHMENT

GMC FISHER BODY PLANT DETROIT, MICHIGAN

Name: Wastewater treatment facility receiving tanks (SWMU 1), wastewater treatment facility treatment tanks (SWMU 2), incinerators (SWMU 3), former drum storage area (SWMU 4), and diphenyl methane diisocyanate spill (AOC 1).

Regulatory Status: Identify any operational permit or permit application and cite the federal, state, or local regulations applicable to these units

Unit Characteristics: General description, including location, dimensions, SWMU or AOC components, construction material, secondary containment, and other relevant characteristics

Operational History: Dates of operation

Current Status: Active, inactive, physically closed, approved closed, or certified closed

Waste Characteristics: Description of types, volumes, and hazardous or nonhazardous characteristics of waste media

Waste Management: Description of handling, treatment, storage, and disposal practices, including names and addresses of disposal facilities used

Release History: Visual evidence or reports of releases of hazardous material, including associated dates and any regulatory actions taken

Potential Pathways: Potential migration pathways such as air, surface water, ground water, soil, or subsurface gas

Exposure Potential: Location and use of nearby water wells, surface water, and other water sources that are potential human and environmental receptors of releases

Remedial Action: Description of any remedial action undertaken as a result of past releases, including dates and types of remediation performed and disposition of waste media.

1991-11-07 08:45

002 P0



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V
220 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604**

REPLY TO ATTENTION OF:

JHR-12

October 31, 1991

Stuart Lichter
S.L. Warehousing Detroit Limited
631 Paseo De La Playa
Redondo Beach, California 90277

Re: Visual Site Inspection
S.L. Warehousing Detroit Ltd.
(formerly GMC Fisher Body -
Fort Street Plant)
MID005336787

Dear Mr. Lichter:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

11-07 08:45

002 P02

October 31, 1991
Page 2

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for November 14, 1991. The inspection team will consist of personnel of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Michigan Department of Natural Resources (DNR) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion may be made available upon request.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

enclosure

cc: Ben Okwumabua, Michigan DNR
Dennis Drake, Michigan DNR - Lansing
Ken Burda, Michigan DNR - Lansing

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HR-12

October 29, 1991

John Christopher
Sybill Incorporated
400 Town Center, Suite 300
Dearborn, Michigan 48126

Re: Visual Site Inspection
Sybill Inc.
(formerly GMC Fisher Body -
Fort Street Plant)
MID005356787

Dear Mr. Christopher:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

October 29, 1991

Page 2

The VSI will be scheduled after your receipt of this letter. The inspection team will consist of personnel of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Michigan Department of Natural Resources (DNR) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion may be made available upon request.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

enclosure

cc: Ben Okwumabua, Michigan DNR
Dennis Drake, MDNR - Lansing
Ken Burda, MDNR - Lansing

Fort Street Plant

September 10, 1985



RECEIVED

SEP 16 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, IL 60604

RECEIVED

SEP 16 1985

Attention: Mr. David A. Stringham
Chief, Solid Waste Branch

Dear Sir:

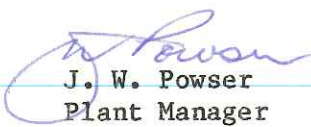
MID603356787, GTSO, PA SWB - AIS
U.S. EPA, REGION V

Enclosed you will find a signed certification statement regarding any releases from solid waste management units at our facility.

We hope that the certified information provided will assist you in deciding favorably on our closure plan.

Should you have any questions on this and any previously provided information, please call our Environmental Contact, Mel Gilmer at (313) 554-7010.

Sincerely,


J. W. Powser
Plant Manager

MAG:vmf

cc M. Gilmer
J. Reynolds
D. Snell
R. Tessier
M. Zdyb - EAS
L. Moody - GM Legal
J. Fannon - G. O.

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Fisher Guide Fort Street Plant
EPA I.D. NUMBER: MID 005356787
LOCATION CITY: 6307 West Fort Street, Detroit
STATE: Michigan

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill	<u> </u>	<u>X</u>
• Surface Impoundment	<u> </u>	<u>X</u>
• Land Farm	<u> </u>	<u>X</u>
• Waste Pile	<u> </u>	<u>X</u>
• Incinerator	<u>X</u>	<u> </u>
• Storage Tank (Above Ground)	<u>X</u>	<u> </u>
• Storage Tank (Underground)	<u>X</u>	<u> </u>
• Container Storage Area	<u>X</u>	<u> </u>
• Injection Wells	<u> </u>	<u>X</u>
• Wastewater Treatment Units	<u>X</u>	<u> </u>
• Transfer Stations	<u> </u>	<u>X</u>
• Waste Recycling Operations	<u> </u>	<u>X</u>
• Waste Treatment, Detoxification	<u> </u>	<u>X</u>
• Other <u> </u>	<u> </u>	<u> </u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

See attachment.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

On 11/21/84 approximately 1,300 gallons of diphenyl methane Diisocyanate
(MDI) was released through a ruptured pressure gauge. All material was
contained in a diked area and subsequently cleaned up.

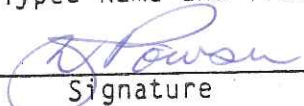
4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

No continuing releases exist.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

J. W. Powser, Plant Manager

Typed Name and Title


Signature

9/12/85
Date

CERTIFICATION REGARDING POTENTIAL RELEASES
FROM SOLID WASTE MANAGEMENT UNITS

Detailed Response to Item 2

Please note that the storage tanks listed, both above and below ground, do not contain stored waste, but store materials for plant use and product fabrication. All storage tanks are listed, many of which store hazardous materials, but not hazardous waste.

Storage Tanks (Above Ground)

1. Two 280,000 gallon tanks which store #6 fuel oil not classed as hazardous per RCRA (240°F flash point).
2. One 16,000 gallon tank which stores a 30 percent phosphoric acid solution considered corrosive and hazardous per RCRA.
3. One 3,600 gallon tank which stores concentrated sulfuric acid considered corrosive and hazardous per RCRA.
4. Two 300 gallon diesel fuel tanks considered hazardous per RCRA.
5. Two 6,000 gallon tanks which store diphenylmethane diisocyanate (MDI) not classed as hazardous per RCRA.
6. Two 6,000 gallon tanks which store polyether polyol not classed as hazardous per RCRA.
7. One 11,000 gallon tank which stores caustic considered corrosive and hazardous by RCRA.
8. One 1,500 gallon and four 475 gallon tanks which store concentrated nitric acid considered corrosive and hazardous per RCRA.
9. One 1,000 gallon tank which stores caustic considered corrosive and hazardous per RCRA.
10. One 1,000 gallon tank which stores a zinc chloride and polymer solution not classed as hazardous per RCRA.
11. Two 6,000 gallon tanks which store caustic considered corrosive and hazardous per RCRA.

Storage Tanks (Below Ground)

1. One 1,000 gallon tank which stores leaded gasoline considered flammable and hazardous per RCRA.
2. One 5,000 gallon tank which stores unleaded gasoline considered flammable and hazardous per RCRA.
3. One 30,000 gallon tank which stores #6 fuel oil not classed as hazardous per RCRA.

Incinerator

The December 1984 completion of our Solid Waste Disposal Resource Recovery Plant is soon to be licensed to operate under Michigan's Public Act 641 to incinerate Type O trash from other facilities as well as our own. Dual Consumat units are capable of disposing of up to 100 tons per day.

Waste disposal will be licensed for and limited to non-hazardous waste.

Container Storage Area

This is a 53.5' x 40.25' paved concrete area constructed with a 4,400 gallon sump basin for collecting any hazardous waste spillage possibilities. The entire surface is contained by a water dam and dikes.

No more than 1,040 drums can be stored at any one time.

The types of hazardous waste stored are flammable liquids, flammable solids and waste methylene chloride mixtures. No hazardous waste is stored for more than 90 days.

Wastewater Treatment Units

Two 300,000 gallon tanks and one 150,000 gallon tank serves as treatment tanks for the wastewater we discharge to Publicly Owned Treatment Works (POTW).

Daily wastewater discharged averages 208,000 gallons per day with maximum daily discharge of 400,000 gallons.

We currently have the ability to treat for pH and hexivalent chrome reduction. We plan to update our capabilities to include treatment for heavy metals, clarification and sludge removal.